



February 27, 2009

Ms. Marlene H. Dortch  
Federal Communications Commission (FCC)  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: EB Docket No. 06-36

Dear Ms. Dortch:

Enclosed for electronic filing in compliance with the FCC customer proprietary network information (CPNI) rules under 47 C.F.R. § 64.2009(e) is the REVISED 2009 CPNI annual compliance certification (for calendar year of 2008) and accompanying statement of operating procedures for Sweetser Rural Telephone Company (499 Filer IDs: 801285) and Comteck of Indiana (499 Filer ID: 817250).

There was a minor typo on the original filing of the certification; therefore this REVISED filing should replace the original filing that was originally dated February 10, 2009. An updated copy will be filed with Best Copy and Printing as well.

Please contact me if you have any questions or concerns regarding this filing.

Respectfully Submitted,

*Wendy Harper*

Wendy Harper  
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402-462-2554

Attachments

**SWEETSER TELEPHONE COMPANY, INC.**

210 N Main St., PO Box 210

Sweetser, IN 46987

765-384-4311 Fax: 765-384-7002

**OAK HILL CABLEVISION, INC.**

765-384-5444

**COMTECK OF INDIANA, INC.**

765-384-7873

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009 - **REVISED FILING**

Date filed: Feb. 27, 2009

Name of companies covered in this certification: Sweetser Telephone, Inc. &amp; Comteck of Indiana, Inc.

Form 499 Filer ID: 801285, 817250

Name of signatory: Dave Fox

Title of signatory: General Manager

I, Dave Fox, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. *See attached accompanying statement of operating procedures.*

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The companies currently have no information with respect to the processes pretexters are using to attempt to access CPNI. At this time, we have not encountered known pretexting. Our protective measures against pretexters are outlined in the accompanying statement of operating procedures.

Signed



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**OPERATING PROCEDURES FOR COMPLIANCE**  
**WITH CPNI REGULATIONS**

Every employee of Sweetser Telephone Co., Inc., Comteck of Indiana, Inc., and its subsidiaries (collectively the "Company") has a duty to protect the confidentiality of customer proprietary information (CPNI), as defined in 47 U.S.C. § 222(f). A violation of the Company's operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.

Local exchange telephone service, Internet access service, and CATV are the only categories of services offered by the company. It is the Company's policy to not use CPNI for any sales or marketing purpose. Specifically, use of CPNI obtained from the Company's provision of one service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.

No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena or is used for the following purposes: (1) to bill or collect payment for the Company's services or (2) to protect the rights or property of the Company or its customers. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information of any marketing purpose.

A company employee shall disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting the information is the person that opened the account with the Company. No Company employee shall disclose CPNI to a person other than the customer unless the customer provides written authorization affirmatively requesting that the customer's CPNI be disclosed to that person.

The Company keeps a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI (hereinafter referred to as "the CPNI record"). An employee who discloses CPNI to a third party or allows a third party access to CPNI must add to the CPNI record the name and address of the third party, a description of the reasons for the disclosure of the CPNI, the specific CPNI that was disclosed, and any written authorization from the customer to disclose the CPNI. This record is maintained by the Company for a minimum period of one year.

The Company holds training sessions twice each year to train employees as to when they are and are not authorized to use or disclose CPNI. Employee attendance at these training sessions is mandatory.

Should the Company make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purpose until after the Company has sent customers the notices required by 47 C.F.R. § 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI. Sales personnel must obtain written supervisory approval before soliciting customer approval for any out-bound marketing campaign. The Company will establish a system by which the status of a customer's CPNI approval can be clearly established if the Company changes its current policy and decides to use CPNI in an out-bound sales or marketing campaign the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.